

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

HIDDEN CITY PHILADELPHIA,

Plaintiff,

v.

ABC, INC.,

Defendant

:
:
: CIVIL ACTION:
:
: No. 2:18-cv-00065-JS
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:

DEFENDANT’S MOTION TO DISMISS PLAINTIFF’S COMPLAINT

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendant ABC, Inc. (“ABC”) hereby moves the Court to dismiss the Complaint in this matter with prejudice for failure to state a claim upon which relief can be granted. In support of its motion, ABC relies on the accompanying Memorandum of Law and materials attached to the Declaration of Hara Jacobs, Esq., which are incorporated herein by reference.

Date: May 16, 2018

Respectfully submitted,

By: /s/Michael Berry

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CERTIFICATE OF SERVICE

I hereby certify that, on May 16, 2018, I caused a true and correct copy of Defendant's Motion to Dismiss Plaintiff's Complaint, the Memorandum of Law in Support of Defendant's Motion to Dismiss, the Declaration of Hara Jacobs, Esq. and all exhibits thereto, and a Proposed Order to be served via the Court's ECF system upon all counsel of record.

Date: May 16, 2018

/s/Michael Berry
Michael Berry